

REMARKS

This amendment is responsive to the Office Action dated May 15, 2008. Applicants have amended claims 1, 15, 28, and 33. Claims 1–40 are pending.

Amendment to Correct Informalities

Applicants have amended claim 33 to correct a typographical error.

Claim Rejection Under 35 U.S.C. § 102

In the Office Action, the Examiner rejected claims 1-10, 15-23, and 27-37 under 35 U.S.C. § 102(e) as being anticipated by Viswanath (US 2004/0019670 A1). Applicants respectfully traverse the rejection to the extent such rejection may be considered applicable to the amended claims. Viswanath fails to disclose each and every feature of the claimed invention, as required by 35 U.S.C. § 102(e), and provides no teaching that would have suggested the desirability of modification to include such features.

Claims 1, 15, and 28

For example, Viswanath fails to teach or suggest applying an implementation-specific configuration policy to validate the changed candidate configuration data, wherein the implementation-specific configuration policy comprises a set of rules representing the specific operational requirements of the particular networks within which the network device operates, as recited by independent claim 1.

In the Office Action, the Examiner argued that the “semantic verification and syntactic validation mechanism for server configuration information”¹ used to “verify and validate changes to configuration information”² disclosed applying an implementation-specific configuration policy. Applicants respectfully disagree with the Examiner’s characterization of the claim terminology and of the reference.

Syntactic validation, as described in the reference and as is well-known in the art, is a grammar check used to ensure the proper order of terms. Semantic verification of configuration

¹ *Viswanath at Abstract.*

² *Id.*

options involves testing whether the terms and syntax used in the option are intelligible given the device being configured. In the case of a router, semantic rules in the form of a configuration policy are enforced to prevent configuration of the router into an unstable state, or into sub-optimal operation.³

In contrast, implementation-specific configuration policies enforce rules promulgated at a higher level so as to enforce requirements that are quite different from syntactic or semantic validation. Rather than being concerned with grammar or the intelligibility of configuration options, implementation-specific configuration policies are specified in based on the particular needs of the network in which the device is to be deployed. Applicant's patent application describes implementation-specific configuration policies as defined by a network manager in response to, for example, client requirements relating to particular requirements of a computer environment, service level agreements with end users, and other requirements.⁴ These implementation-specific options and the policies that enforce them therefore "vary depending on the specific needs of the networks within which the devices operate."⁵ Thus, while a candidate configuration may be syntactically and semantically correct, it may nevertheless violate one or more implementation-specific configuration policies.

Although the Applicants submit that the use of the phrase "implementation-specific configuration policy" is adequately defined in the specification, Applicants have nevertheless amended independent claims 1, 15, and 28 to clarify the distinction between this type of configuration policy and the syntactical and semantic rules found in a typical configuration policy. In particular, the amended claims state that an implementation-specific configuration policy comprises a set of rules representing the specific operational requirements of the particular networks within which the network device operates.

Viswanath fails to teach or suggest applying this feature to validate the changed configuration data. Instead, the reference is limited to semantic verification and syntactic validation of server configurations.⁶

³ Application ¶ [0007].

⁴ *Id.* ¶ [0026].

⁵ *Id.* ¶ [0008].

⁶ *Viswanath* at *Abstract*.

Claims 2, 16, and 29

The dependent claims recited a number of additional features that are likewise not disclosed by Viswanath. For example, claims 2, 16, and 29 require identifying an error within the changed candidate configuration data based on the implementation-specific configuration policy and correcting the error by automatically altering the changed candidate configuration data in response to the identified error.

As explained with respect to claim 1, Viswanath does not disclose the use of an implementation-specific configuration policy and therefore cannot identify an error within the changed candidate configuration data on the basis of such a policy. Moreover, the Examiner conflates the error correction of claim 2 with the error handling found in the reference. The Examiner argued that component 438 of Viswanath FIG. 12 teaches or at least suggests automatically altering the changed candidate configuration data in response to an identified error. However, the reference merely teaches that if an error is found, then the error “may be handled.”⁷ In the only proffered example in the reference, handling the error in the changed candidate configuration data comprises throwing exception.⁸ Contrary to the Examiner’s argument, there is nothing in this portion of the reference that suggests correcting an error by automatically altering the changed candidate configuration data.

Claims 3, 17, and 30

As an additional example, claims 3, 17 and 30 recite identifying a warning condition within the changed candidate configuration data based on the implementation-specific configuration policy and correcting the warning condition by automatically altering the changed candidate configuration data.

Although the Examiner cited Viswanath FIG. 12 as disclosing this feature, the components of that feature disclose only identifying a warning condition and notifying the user of such this condition.⁹ There is nothing in the reference to suggest automatically altering the changed candidate configuration data, as required by Applicants’ claims. Rather, the ‘change’

⁷ Viswanath ¶ [0153].

⁸ *Id.*

⁹ *Id.*

term used in Viswanath FIG. 12 and ¶ [0153] (cited by the Examiner) refers to the “change request . . . initiated [by a user] to change the configuration data.”¹⁰ That is, once the warning is relayed to the user, the Viswanath method makes the requested change to the configuration data in spite of the warning. In the Applicants’ claims, by contrast, the candidate configuration data is already changed (“changed candidate configuration data”). This change may lead to a warning condition that may be identified and corrected per claim 3. The Viswanath method does not automatically alter the changed candidate configuration data to correct the warning condition in the changed candidate configuration data. In fact, Viswanath the method does not make any corrections whatsoever. The cited reference, therefore, is unable to anticipate these claims.

Summary

Viswanath fails to disclose each and every limitation set forth in claims. For at least these reasons, Viswanath fails to establish a prima facie case for anticipation of Applicants’ claims 1–10, 15–23, and 27–37 under 35 U.S.C. § 102(e). Withdrawal of this rejection is requested.

Claim Rejection Under 35 U.S.C. § 103

In the Office Action, the Examiner rejected claims 11–14, 24–26, and 38–40 under 35 U.S.C. § 103(a) as being unpatentable over Viswanath in view of Watson-Luke et al. (US 2005/0114692 A1). Applicant respectfully traverses the rejection to the extent such rejections may be considered applicable to the claims as amended. The applied references fail to disclose or suggest the inventions defined by Applicant’s claims, and provide no teaching that would have suggested the desirability of modification to arrive at the claimed invention.

In regard to claim 11, the Applicant agrees with the Examiner acknowledgement that Viswanath does not disclose the features of this dependent claim, wherein the implementation-specific configuration policy of independent claim 1 is user-definable by a client, the method further comprising receiving input from the client and updating the implementation-specific configuration policy based on the input. However, the Examiner stated that incorporation of

¹⁰ *Viswanath* ¶ [0152].

these features would have been obvious in view of Watson-Luke. Applicant respectfully submits that the Examiner has misinterpreted the scope and content of this reference.

The “validation classes”¹¹ described in Watson-Luke, which the Examiner argues are analogous to implementation-specific configuration policies, enforce constraints on “configuration items.”¹² Configuration items, according to the reference, are telecommunications products or services selected from a catalog.¹³ Configuration items also may include “high-level product catalog items . . . , or configuration policies and composite configuration items.”¹⁴ Amended claim 1 of the present application, by contrast, recites an implementation-specific policy comprising a set of rules representing the specific operational requirements of the particular networks within which the network device operates. Product catalog items and policies related to those items are neither similar nor even analogous to operational requirements of a network. Dependent claims 11–14, 24–26, and 38–40, which incorporate the element of an implementation-specific configuration policy, are therefore not obvious in view of Watson-Luke.

For at least these reasons, the Examiner has failed to establish a prima facie case for non-patentability of Applicant’s claims 11–14, 24–26, and 38–40 under 35 U.S.C. § 103(a). Withdrawal of this rejection is requested.

¹¹ *Watson-Luke* ¶ [0118].

¹² *Id.*

¹³ *Id.* at Claim 1.

¹⁴ *Id.* at Abstract.

CONCLUSION

All claims in this application are in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of all pending claims. Please charge any additional fees or credit any overpayment to deposit account number 50-1778. The Examiner is invited to telephone the below-signed attorney to discuss this application.

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